

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Appln. No.: 10/054,279

AMENDMENTS TO THE DRAWINGS

Submitted herewith please find 1 sheet of proposed drawing corrections (Figure 7) with the changes indicated in red ink and 1 sheet of replacement drawings. The Examiner is respectfully requested to acknowledge receipt of the drawing corrections and approve the changes.

Attachment: Annotated Marked-Up Drawings of Fig. 7

Corrected Formal Drawings of Fig. 7 (Replacement Sheets)

REMARKS

Claims 1-7 and 24-53 are pending in the application. By this Amendment, new claims 52 and 53 are added. Claims 1-7 and 24-51 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Williams *et al.* (U.S. Patent No. 6,024,019; hereinafter “Williams”) in view of Corrado *et al.* (U.S. Patent No. 6,196,128; hereinafter “Corrado”).

As a preliminary matter, Applicant thanks the Examiner for acknowledging Applicant’s election of Species I, Figs. 5-9, 24, 25, 27-29, 32 and 36-43 and claims 1-7 and 24-51, filed on December 23, 2004.

The Examiner objects to the drawings as not showing the “suction apparatus” as recited in claim 1. Applicant submits herewith a corrected Fig. 7 and submits that the drawing corrections do not add new matter and are fully supported in the specification. *See e.g.*, page 27, lines 7-11.

The Examiner also objects to the claims for the various reasons noted in the Office Action. Applicant submits minor cosmetic changes to the claims as shown in the Appendix below for improved clarity.

Applicant submits the arguments below in traversal of the claim rejections.

Applicant respectfully submits that claim 1 is patentable because a *prima facie* case of obviousness has not been established. Claim 1 recites:

A recording apparatus comprising:
a recording medium fixing member having a plurality of suction ports on a fixed surface to fix a recording medium;

an adhering roller which is operable to contact with or operable to separate from the recording medium fixing member and which cleans the fixed surface;

a flexible plate which is attached onto the fixed surface of the recording medium fixing member and whose contact surface with the recording medium is cleaned by the adhering roller; and

a suction apparatus for recording medium fixing which sucks air from the suction ports of the recording medium fixing member and sucks and fixes the flexible plate and the recording medium onto the fixed surface.

Applicant submits that the combination of Williams and Corrado fails to teach, suggest or provide motivation for a recording apparatus comprising, *inter alia*, a flexible plate as claimed. In the Office Action, the Examiner argues that the printing structure 122 (col. 12, lines 45-46) or that the plate material 306 correspond to the claimed flexible plate. The printing structure 122 and the plate material 306, however, are disclosed as the structures on which an image is printed (col. 6, lines 36-41; col. 10, lines 44-46). In other words, the printing structure 122 and the plate material are not disclosed as being disposed between any sort of roller and a structure on which an image is printed. Therefore, neither the printing structure 122 nor the plate material 306 can possibly be attached onto the fixed surface of the recording medium fixing member and *whose contact surface with the recording medium* is cleaned by the adhering roller, as claimed.

In addition, there is no motivation to combine the references in the manner suggested by the Examiner. In the Office Action, the Examiner states that Williams discloses “a recording apparatus having . . . a recording medium fixing member 500 which includes a plurality of suction ports 506 which secure the flexible plate 306, 122 and a cylinder cleaner 325.” Although the Examiner argues that the tubular vacuum manifold 500 of Williams corresponds to the

claimed recording medium fixing member 500, the cylinder cleaner 325, however, is disclosed in an alternative embodiment which does not include the tubular vacuum manifold 500.

Rather, the cylinder cleaner 325 is disclosed in entirely different embodiments and therefore, such mixing and matching of components from different embodiments is impermissible because “[t]he elements must be arranged as required by the claim.” M.P.E.P. § 2131. The teachings of different embodiments in a single reference may not be combined absent a suggestion to do so. *In re Kramer*, 18 USPQ2d 1415, 1416 (Fed. Cir. 1991).

Without the cylinder cleaner 325, there is no motivation for one skilled in the art to modify the embodiment of Williams which includes the tubular vacuum member 500 with the secondary contact cleaning roller (CCR) 40 disclosed by Corrado.

Moreover, Applicant respectfully submits that the Examiner’s supplied motivation in modifying the teachings of Williams with Corrado lacks merit. In Williams, the cylinder cleaner 325 is disclosed for embodiments which use an adhesive to affix a thin printing member on to a surface. Col. 6, lines 19-21 and lines 62-64. The cylinder cleaner 325 thus becomes necessary to remove the residual adhesives remaining on the surface to which the thin printing member was previously affixed. In the embodiment disclosing the tubular vacuum manifold 500, however, there is no such need for a cylinder cleaner 325 because the negative pressure in the tubular vacuum manifold 500 affixes the thin printing member. Therefore, Williams effectively *teaches away* from any modification to clean the surface of the tubular vacuum manifold 500 and the Examiner’s supplied motivation, i.e., “to improve the efficiency of cleaning the fixed surface of a recording medium fixing,” is without support.

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Claims 2-4 which depend from claim 1, are patentable for at least the reasons submitted for claim 1.

In addition, claims 2 and 3 are patentable because neither Williams nor Corrado teaches, suggests or provides motivation for the adhesive strength of the adhering roller (claim 2) or for the hardness of the adhering roller (claim 3).

For reasons similar to those submitted for claim 1, claims 5-7 are patentable. For example, Williams and Corrado fail to teach, suggest or provide motivation for the claimed flexible member.

Applicant submits that claim 24 is patentable because Williams and Corrado fail to teach, suggest or provide motivation for the adhesive roller comprising a crown shape as claimed. Rather, all the CCRs disclosed by Corrado have perfectly cylindrical shapes.

Claims 25-34, which depend from claim 24, are patentable for at least the reasons submitted for claim 24.

For reason similar to those submitted for claim 24, claim 35 is patentable because neither Williams nor Corrado teaches, suggests or provides motivation for the adhesive roller comprising a crown shape, as claimed.

Claims 36-42, which depend from claim 35, are patentable for at least the reasons submitted for claim 35.

Applicant submits that Claim 43 is patentable because Williams and Corrado fail to teach, suggest or provide motivation for removing foreign material on the recording medium

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surface in a cleaning, wherein the cleaning is firstly conducted from an almost central portion of a relative movement direction of the recording medium fixed onto the recording medium fixing member to *one relative movement direction end portion*, and secondly conducted from the almost central portion of the relative movement direction of the recording medium to *another relative movement direction end portion*. Rather, Corrado merely discloses the conveyance of a substrate 16 such as a web without any mention of any end portions. Therefore, the references cannot possibly suggest or provide motivation for the operation of removing foreign material in the manner claimed.

For reasons similar to those submitted for claim 43, claims 44-45 are patentable.

In addition, claim 45 is patentable because Corrado fails to teach, suggest or provide motivation for any sort of relatively moving the cleaning roller in a reversal direction.

Claims 46-49, which depend from claim 45, are patentable for at least the reasons submitted for claim 45.

Claim 50 is patentable for the reasons submitted for claim 43.

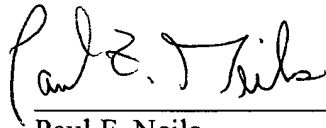
Claim 51, which depends from claim 50, is patentable for at least the reasons submitted for claim 50.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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Respectfully submitted,



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